

AO 91 (Rev. 8/01) Criminal Complaint

United States District Court

United States District Court
Southern District of Texas
FILED

SOUTHERN

DISTRICT OF

TEXAS

JAN 28 2018

MCALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Juan Carlos Andujar-Sanchez

Case Number: M-18-0185-M

IAE YOB: 1968

Dominican Republic

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my

knowledge and belief. On or about January 27, 2018 in Hidalgo County, inthe Southern District of Texas

(Track Statutory Language of Offense)

being then and there an alien who had previously been deported from the United States to the Dominican Republic in pursuance of law, and thereafter was found near Sullivan City, Texas, within the Southern District of Texas, the Attorney General of the United States and/or the Secretary of Homeland Security, not theretofore having consented to a reapplication by the defendant for admission into the United States;

in violation of Title 8 United States Code, Section(s) 1326 (Felony)I further state that I am a(n) Senior Patrol Agent and that this complaint is based on the

following facts:

Juan Carlos Andujar-Sanchez was encountered by Border Patrol Agents near Sullivan City, Texas on January 27, 2018. The investigating agent established that the Defendant was an undocumented alien and requested record checks. The Defendant claims to have illegally entered the United States on January 27, 2018, near Rio Grande City, Texas. Record checks revealed the Defendant was formally Deported/Excluded from the United States on January 23, 1998 through Newark, New Jersey. Prior to Deportation/Exclusion the Defendant was instructed not to return to the United States without permission from the U.S. Attorney General and/or the Secretary of Homeland Security. On July 29, 1996, the defendant was convicted of 21 USC 841(a)(1) & (b)(1)(B), 21 USC 846 and 18 USC 911, Possession with intent to distribute cocaine, Conspiracy with intent to distribute cocaine and false representation of U.S. citizenship and sentenced to thirty-seven (37) months confinement for counts 1 and 2, thirty-six (36) months on count 3 to be served concurrently; five (5) years supervised release term on each of counts 1 and 2 and one (1) year on count 3 to be served concurrently.

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on January 28, 2018.

Continued on the attached sheet and made a part of this complaint:

☐ Yes ☒ No

Submitted by reliable electronic means, sworn to and attested to
telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

Sworn to before me

January 28, 20183:28 p.m./S/Jayson Springer

Signature of Complainant

Jayson SpringerSenior Patrol AgentPeter E. Ormsby, U.S. Magistrate Judge

Name and Title of Judicial Officer

Pete E Ormsby
Signature of Judicial Officer